

# EXHIBIT 2

**Victor Otten**

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**From:** Samantha Wolff <SWolff@hansonbridgett.com>  
**Sent:** Thursday, March 2, 2017 9:13 AM  
**To:** Cooper, Robert S.; 'Jworgul@veatchfirm.com' (Jworgul@veatchfirm.com); 'rdieffenbach@veatchfirm.com'; Peter Crossin  
**Cc:** Kurt A. Franklin; Victor Otten  
**Subject:** RE: Blakeman's response to interrogatories

Bob,

Thanks very much for your email. A protective order is not appropriate here because the court already indicated that it does not believe individuals' contact information is private (insofar as it has required the plaintiffs to disclose contact information for witnesses). I don't see why Mr. Blakeman's phone number – when he is party and is not a peace officer – should be treated any differently. Additionally, Mr. Blakeman already provided his number (or some version of it) at his deposition without any objection. He said he wasn't sure if he'd provided it accurately though, and that's why we're following up. And although he was instructed not to answer a question about his wife's email address on the basis of privacy, no such instruction or objection was made with respect to his cell phone number. Mr. Blakeman also said at his deposition that his cell phone and service are paid for by the City of Palos Verdes Estates. If true, this suggests his number would be a public record. In sum, we're entitled to this information, and don't see how it's protected.

That said, if you'd like to direct me to any applicable case law and explain any special circumstance that we're overlooking that warrant special protection for Mr. Blakeman's cell phone information, I'd be glad to consider it. I realize your client relied on the California Constitution, Article I, section 1 (in part) as a basis for his objection but the privacy protections under the California Constitution are inapplicable here, where we are in federal court pursuant to a federal question, not diversity.

If we are unable to reach consensus, we would like to raise this issue with the Magistrate on Friday.

Thanks,  
Samantha

**From:** Cooper, Robert S. [mailto:rcooper@buchalter.com]  
**Sent:** Wednesday, March 1, 2017 11:26 AM  
**To:** Samantha Wolff <SWolff@hansonbridgett.com>; 'Jworgul@veatchfirm.com' (Jworgul@veatchfirm.com) <Jworgul@veatchfirm.com>; 'rdieffenbach@veatchfirm.com' <rdieffenbach@veatchfirm.com>; Peter Crossin <PCrossin@veatchfirm.com>  
**Cc:** Kurt A. Franklin <kfranklin@hansonbridgett.com>; Victor Otten <vic@ottenlawpc.com>  
**Subject:** RE: Blakeman's response to interrogatories

Samantha:

In response to your email, Defendant Blakeman will agree to provide the phone number once we have agreed to an appropriate protective order.

We will provide you with a draft protective order relating to this issue shortly. This should obviate the need for a call with Magistrate Oliver.

Please do not hesitate to contact me should you wish to further discuss this matter.

Very truly yours,

Bob

*Robert S. Cooper*  
Shareholder  
**Buchalter**

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Email: [rcooper@buchalter.com](mailto:rcooper@buchalter.com) | [www.buchalter.com](http://www.buchalter.com)

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**From:** Samantha Wolff [<mailto:SWolff@hansonbridgett.com>]  
**Sent:** Monday, February 27, 2017 10:17 AM  
**To:** 'Jworgul@veatchfirm.com' ([Jworgul@veatchfirm.com](mailto:Jworgul@veatchfirm.com)); 'rdieffenbach@veatchfirm.com'; Peter Crossin; Cooper, Robert S.  
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Dear Counsel,

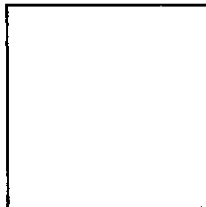
I am writing regarding Defendant Blakeman's response to Plaintiff's interrogatory requesting his cell phone number. We don't believe his phone number is protected from disclosure under Article I, section 7 of the California Constitution. Please let me know when you are available for a call this week with the Magistrate Judge.

Thank you.

Samantha

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**Samantha Wolff**  
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Hanson Bridgett LLP  
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(415) 995-3547 Fax  
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**Victor Otten**

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*Robert S. Cooper*  
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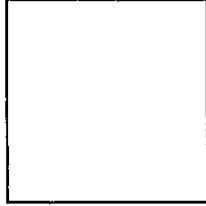
Samantha

**Samantha Wolff**

**#5148**

**Partner**

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